

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**VADIM E. MIKERIN,**

**Defendants.**

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**CRIMINAL NO. TDC-14-0529**

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**MOTION FOR EXTENSION OF TIME**

The United States of America, by and through the undersigned counsel, hereby respectfully requests an additional two days, through and including June 24, 2015 to respond to Defendant's Motion for Return of Property, and states as reasons the following:

(1) The Defendant's Motion for the return of \$18,170 in U.S. Currency, seized from the Defendant's apartment on October 29, 2014, was filed on June 8, 2015. Any opposition thus is due on June 22, 2015.

(2) The Government needs additional time to compose and review its response to the Motion and believes its response can be filed on or before June 24, 2015.

(3) Defense counsel was contacted and has no objection to the extension.

**WHEREFORE**, the Government respectfully requests an additional two days, through and including June 24, 2015, to file any Opposition.

Respectfully submitted,

Rod J. Rosenstein  
United States Attorney

\_\_\_\_\_  
/s/  
David I. Salem

Assistant United States Attorney  
6500 Cherrywood Lane, Suite 200  
Greenbelt, MD 20770

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**ORDER**

Having considered the Governemnt's request for an extension to respond to/oppose Defendant's Motion for Return of Seized Property, and there being no objection thereto, it is this \_\_\_\_\_ day of June 2015,

**HEREBY ORDERED** that the deadline for any response/opposition to Defendant's Motion shall now be extended to June 24, 2015.

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Theodore D. Chuang  
United States District Judge

**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on June 22, 2015, a copy of the foregoing Government's Motion for

Extension of Time was served by ECF on Defendant's Counsel:

William Jacobson, Esq.  
Jonathan Lopez, Esq.  
Orrick, Herrington, & Sutcliffe LLP  
Orrick Building at Columbia Center  
1152 15th St. NW  
Washington, D.C. 20005

\_\_\_\_\_/s/\_\_\_\_\_  
David I. Salem  
Assistant United States Attorney

